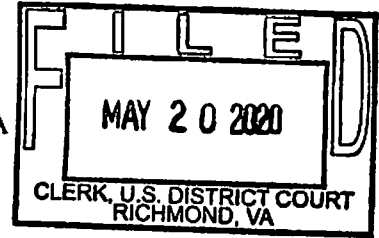


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



GREGORY CONTE AND WARREN BALOGH,

Plaintiffs,

v.

Case No. 3:19-cv-00575-MHL

COMMONWEALTH OF VIRGINIA AND
TERENCE R. MCAULIFFE AND VIRGINIA
STATE POLICE AND STEVEN FLAHERTY
AND BRIAN JOSEPH MORAN AND BECKY
CRANNIS-CURL AND CITY OF
CHARLOTTESVILLE AND MICHAEL
SIGNER AND WES BELLAMY AND
CHARLOTTESVILLE POLICE DEPARTMENT
AND AL THOMAS, JR.,

Defendants.

PLAINTIFFS' MOTION TO EXTEND TIME TO SUBMIT RESPONSE TO DEFENDANTS'
MOTIONS TO DISMISS

COMES NOW Plaintiffs Gregory Conte and Warren Balogh, *pro se*, to move for a further 30-day extension to respond to Defendants' Motions to Dismiss (filed March 3, 2020).


Plaintiffs are making this request because the eruption of COVID-19 and the concomitant Declaration of National Emergency have hindered plaintiffs' efforts to respond to Defendants' arguments within the court-mandated time-frame, as the situation has required Plaintiffs to take on additional family responsibilities and has hindered them in the conduct of regular business. In addition, Plaintiffs home counties are still under restrictions, which have prevented them from conducting legal research (law libraries are still closed or have only just re-opened).

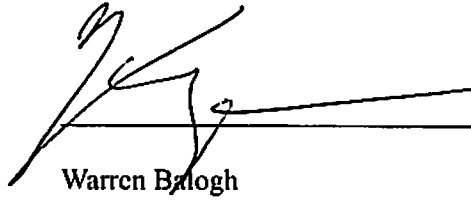
Plaintiffs have contacted defense counsel who have agreed not to oppose this motion.

Therefore, Plaintiffs respectfully ask this Honorable Court to grant a 30-day extension.

Dated May 19, 2020.

Respectfully Submitted,

 5.19.20
Gregory Conte

 5/19/20
Warren Balogh

C E R T I F I C A T E

I hereby certify that on the 19th day of May, 2020, I sent the foregoing to the Clerk of the Court by first class mail, which will send notification of such filing to all counsel of record.

I hereby certify that I have mailed by United States Postal Service the document to the following:

Robert B. McEntee, III (VSB No. 89390),
Erin R. McNeill (VA Bar No. 78816),
and Madeline M. Gibson (VSB No. 87561)
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(Representing the City of Charlottesville and Charlottesville Police Department)

David P. Corrigan (VSB No. 26341)
and Melissa Y. York (VSB No. 77493)
Harman, Claytor, Corrigan & Wellman
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Richmond, Virginia 23255
(representing Al Thomas, Jr. and Wes Bellamy)

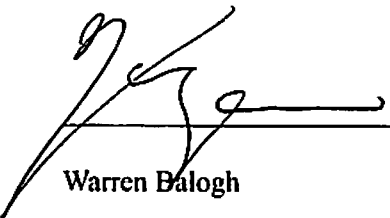
Rosalie Pemberton Fessier VSB 39030
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P.O. Box 108 Staunton VA 24402
(Representing Wes Bellamy)

Dated May 19, 2020.

Respectfully Submitted,

 5-19-20

Gregory Conte

 5/19/20

Warren Balogh